

HONORABLE RICARDO S. MARTINEZ

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

COSMOS GRANITE (WEST), LLC, a
Washington limited liability company,

Plaintiff,

v.

MINAGREX CORPORATION, d/b/a MGX
Stone,

Defendant.

NO. 2:19-cv-01697-RSM

**STIPULATED MOTION AND ORDER
FOR EXTENSION OF CERTAIN
DEADLINES**

**Note on Motion Calendar:
April 10, 2020**

WHEREAS, on December 13, 2019, the Court issued an Order Setting Trial Date and Related Dates (Dkt. No. 15);

WHEREAS, due to the unprecedented effects of the COVID-19 pandemic, and the challenges and difficulties associated with conducting discovery under Washington's stay-at-home order, the parties determined that a change to the dates and schedule previously set by the Court is necessary;

WHEREAS, the parties have agreed to extend certain deadlines due to the challenges and difficulties associated with conducting discovery under Washington's stay-at-home order;

WHEREAS, the parties believe that the Court is well acquainted with the circumstances of this national health emergency, and is more than likely aware of the general

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1 nature of the impact on law firms during this uncertain time; however, should the Court require
 2 declarations explaining the impact of the COVID-19 pandemic of their respective counsel's
 3 law firms, the parties are more than willing to articulate specific circumstances supporting
 4 good cause for this modification.

5 IT IS HEREBY STIPULATED AND AGREED by and through the undersigned
 6 counsel for Plaintiff and Defendant, in accordance with LCR 7(d)(1) and 10(g), subject to the
 7 approval of the Court, that trial be continued from October 26, 2020 to January 11, 2021 or as
 8 soonest thereafter as the Court permits, and the deadlines in the shall be modified as set forth
 9 below:

10	Event Title	Current Deadline	Proposed Amended Deadline
11	JURY TRIAL DATE	October 26, 2020	January 11, 2021
12	Disclosure of Expert Testimony under	April 29, 2020	July 15, 2020
13	FRCP 26(a)(2)		
14	All Motions Related to Discovery must be	May 29, 2020	August 14, 2020
15	filed by (<i>see</i> LCR 7(d))		
16	Discovery Completed by	June 29, 2020	September 14, 2020
17	All dispositive motions must be	July 28, 2020	October 13, 2020
18	filed by and noted on the motion calendar no later than the fourth Friday thereafter (see LCR 7(d))		
19	Mediation per LCR 39.1(c)(3), if requested	September 11, 2020	November 27, 2020
20	by the parties , held no later than		
21	All motions in limine must be filed by	September 28, 2020	December 14, 2020
22	and noted on the motion calendar no later than the THIRD Friday thereafter		
23	Agreed pretrial order due	October 14, 2020	December 30, 2020

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1 Pretrial conference to be scheduled by
2 the Court.

3 Trial briefs, proposed voir dire questions,
4 jury instructions, neutral statement of
5 the case, and trial exhibits due

October 21, 2020

January 6, 2021

6 DATED this 10th day of April, 2020.

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8 By: /s/ Blair M. Russ

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ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED this 15th day of April, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

By: /s/ Blair M. Russ

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